

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION

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SCOTT WEAVER, Individually and  
on Behalf of All Others Similarly Situated,

Plaintiff,

v.

Case No. 2:18-cv-1996-JPS

CHAMPION PETFOODS USA INC. and  
CHAMPION PETFOODS LP,

Defendants.

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**DECLARATION OF DAVID A. COULSON IN SUPPORT OF  
DEFENDANTS' RESPONSE IN OPPOSITION TO  
PLAINTIFF'S RENEWED MOTION FOR CLASS CERTIFICATION**

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I, DAVID A. COULSON, declare and state as follows:

1. I am an attorney at GREENBERG TRAURIG, P.A. I represent Defendants Champion Petfoods USA Inc. and Champion Petfoods LP (collectively, "Champion") and submit this declaration in support of Defendants' Response in Opposition to Plaintiff's Renewed Motion for Class Certification. This declaration is based on my personal knowledge and review of my files.

2. Attached as "**Exhibit A**" is a true and correct copy of the deposition of Plaintiff Scott Weaver.

3. Attached as "**Exhibit B**" is a true and correct copy of CPFB00077-78, the DogStar ORIEN Regional Red bag entered as Exhibit 4 in the Deposition of Plaintiff Scott Weaver.

4. Attached as "**Exhibit C**" is a true and correct copy of CPFB00083, the NorthStar ORIEN Regional Red bag entered as Exhibit 8 in the Deposition of Plaintiff Scott Weaver.

5. Attached as “**Exhibit D**” is a true and correct copy of CPFB00084-85, the DogStar ORIEN Six Fish bag entered as Exhibit 5 in the Deposition of Plaintiff Scott Weaver.

6. Attached as “**Exhibit E**” is a true and correct copy of CPFB00090, the NorthStar ORIEN Six Fish bag entered as Exhibit 6 in the Deposition of Plaintiff Scott Weaver.

7. Attached as “**Exhibit F**” is a true and correct copy of a Declaration of Chinedu Ogbonna, with its Exhibits 1 and 2 attached thereto.

8. Attached as “**Exhibit G**” is a true and correct copy of the deposition of Peter Muhlenfeld Volume 1, taken on November 13, 2018.

9. Attached as “**Exhibit H**” is a true and correct copy of the deposition of Peter Muhlenfeld Volume 2, taken on December 4, 2018.

10. Attached as “**Exhibit I**” is a true and correct copy of the deposition of Jeff Johnston taken on November 29, 2018.

11. Attached as “**Exhibit J**” is a true and correct copy of a Declaration of Christopher Milam.

12. Attached as “**Exhibit K**” is a true and correct copy of a Declaration of Richard Raposo.

13. Attached as “**Exhibit L**” is a true and correct copy of the Expert Report of Dr. Robert H. Poppenga, DVM, PhD, DABVT.

14. Attached as “**Exhibit M**” is a true and correct copy of the deposition of Gary Pusillo Volume 1, taken on April 26, 2019.

15. Attached as “**Exhibit N**” is a true and correct copy of the deposition of Gary Pusillo Volume 2, taken on May 31, 2019.

16. Attached as “**Exhibit O**” is a true and correct copy of the deposition of Sean Callan Volume 1, taken on May 9, 2019.

17. Attached as “**Exhibit P**” is a true and correct copy of the deposition of Kenneth Gilmurray, with its Exhibit 21 attached thereto.

18. Attached as “**Exhibit Q**” is a true and correct copy of the deposition of Jim Wagner taken on April 3, 2019.

19. Attached as “**Exhibit R**” is a true and correct copy of an excerpt of the deposition of Matthew Ficarelli taken on March 18, 2019.

20. Attached as “**Exhibit S**” is a true and correct copy of an excerpt of the deposition of Jennifer Reitman taken on January 4, 2019.

21. Attached as “**Exhibit T**” is a true and correct copy of an excerpt of the deposition of Carol Shoaff taken on January 3, 2019.

22. Attached as “**Exhibit U**” is a true and correct copy of an excerpt of the deposition of Lisa Slawsby taken on January 25, 2019.

23. Attached as “**Exhibit V**” is a true and correct copy of an excerpt of the deposition of Erin Grant taken on June 28, 2019.

24. Attached as “**Exhibit W**” is a true and correct copy of an excerpt of the deposition of Kellie Loeb taken on September 25, 2019.

25. Attached as “**Exhibit X**” is a true and correct copy of the deposition of Sean Callan Volume 2, taken on August 20, 2019.

26. Attached as “**Exhibit Y**” is a true and correct copy of the deposition of Erik Flakstad, taken on December 7, 2018.

27. Attached as “**Exhibit Z**” is a true and correct copy of a Declaration of Jim Wagner.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 3rd day of March, 2020 in Miami, Florida.

s/ David A. Coulson  
David A. Coulson